

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;  
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;  
PLAINTIFF ALYAS; PLAINTIFF MARCOS;  
PLAINTIFF AHMED; PLAINTIFF RACHEL;  
PLAINTIFF ALI; HIAS, INC.; CHURCH  
WORLD SERVICE, INC.; and LUTHERAN  
COMMUNITY SERVICES NORTHWEST,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; MARCO RUBIO,  
in his official capacity as Secretary of State;  
KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security; ROBERT F.  
KENNEDY, JR., in his official capacity as  
Secretary of Health and Human Services,

*Defendants.*

Case No. C25-255 JNW

**DECLARATION OF LAURIE  
BALL COOPER IN SUPPORT  
PLAINTIFFS' PORTION OF JOINT  
STATUS REPORT**

I, Laurie Ball Cooper, hereby declare as follows:

1. I am over the age of eighteen and competent to make this declaration. I am an attorney with the International Refugee Assistance Project (IRAP) and counsel for Plaintiffs in the above-captioned matter.

1           2.       I am also the Vice President of U.S. Legal Programs at IRAP. In this role I oversee  
2 our U.S. legal services, litigation, and pro bono departments and frequently interact with IRAP's  
3 global legal services teams, including our offices in Jordan and Lebanon, and our team known as  
4 our Global Screenings and Casework team.

5           3.       I make this declaration based on personal knowledge about which I am competent  
6 to testify.

7           4.       I submit this declaration to provide the Court true and correct copies of certain  
8 documents submitted in support of Plaintiffs' factual assertions in the Joint Status Report  
9 submitted on March 14, 2025.

10          5.       **Exhibit 1** is a true and correct redacted copy of an email received by an IRAP staff  
11 member dated March 5, 2025 with the subject line: "Automatic reply: Urgent Request to Continue  
12 CAM Processing and Reschedule Travel . . . ."

13          6.       **Exhibit 2** is a true and correct redacted copy of an email received by an IRAP  
14 staff member dated March 11, 2025, with the subject line: "P-1 Embassy Referral Submission  
15 Inquiry".

16          7.       **Exhibit 3** is a true and correct redacted copy of an email received by an IRAP  
17 staff member dated March 11, 2025, with the subject line: "Follow up on the Tunisian case".

18          8.       **Exhibit 4** is a true and correct copy of an email received by an IRAP staff  
19 member dated March 11, 2025, with the subject line: "RE: [NORMAL] IRAP P1 NGO Referral  
20 Submission - LE (ERAC): S-39237".

21          9.       **Exhibit 5** is a true and correct copy of an email received by an IRAP staff  
22 member dated March 11, 2025, with the subject line: "RE: Post-USCIS Urgent P1 Submissions –  
23 IRAP".

24          10.       **Exhibit 6** is a true and correct copy of the declaration of Katherine Rehberg dated  
25 March 14, 2025.  
26

1  
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3  
4 \* \* \*  
5 I declare under penalty of perjury under the laws of the United States that the foregoing is  
6 true and correct.

7 EXECUTED this 14th day of March, 2025, at McLean, Virginia.

8 s/ Laurie Ball Cooper  
9 Laurie Ball Cooper  
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# Exhibit 1



Sara French &lt;sfrench@refugeerights.org&gt;

**Automatic reply: Urgent Request to Continue CAM Processing and Reschedule Travel for [REDACTED]; [REDACTED]; [REDACTED]**

RSC Latin America Info Center <icla@iom.int>  
To: Sara French <sfrench@refugeerights.org>

Wed, Mar 5, 2025 at 9:34 PM

Gracias por contactarse con el **Centro de Apoyo para el Reasentamiento (RSC) para América Latina**, operado por la **Organización Internacional para las Migraciones (OIM)**.

*De acuerdo con la Orden Ejecutiva del presidente de Estados Unidos sobre el «Realineamiento del Programa de Admisión de Refugiados de los Estados Unidos», las actividades del Programa han sido suspendidas. No podemos responder a sus consultas en este momento. Esto incluye tanto las consultas generales como las relativas a casos específicos. Nos disculpamos cordialmente por este inconveniente.*

Todos los servicios de Reasentamiento son gratuitos y por razones de seguridad y confidencialidad, el RSC no tiene ninguna red social (Facebook, Instagram, TikTok, etc.) y no comparte ninguna información relacionada con el programa a través de las redes sociales de la OIM. Si sospecha de alguna actividad fraudulenta, por favor repórtelo a:

[fraudrsclatinamerica@iom.int](mailto:fraudrsclatinamerica@iom.int)

\*\*\*

Thank you for contacting the **Resettlement Support Center (RSC) in Latin America** operated by the **International Organization for Migration (IOM)**. We acknowledge receipt of your email, and the information shared.

Following the U.S. President's Executive Order on Realigning the United States Refugee Admissions Program, the activities of the Program have been suspended. We are unable to respond to inquiries at this time. This includes both general and case-specific inquiries. We sincerely apologize for this inconvenience.

All Resettlement services are free of charge and for reasons of confidentiality and security, the RSC does not have any social media outlets and does not share any information related to the program through IOM's social media networks. If you suspect any fraudulent activity, please report it to: [fraudrsclatinamerica@iom.int](mailto:fraudrsclatinamerica@iom.int).

===== The information contained in this electronic message and any attachments are intended for specific individuals or entities, and may be confidential, proprietary or privileged. If you are not the intended recipient, please notify the sender immediately, delete this message and do not disclose, distribute or copy it to any third party or otherwise use this message. The content of this message does not necessarily reflect the official position of the International Organization for Migration (IOM) unless specifically stated. Electronic messages are not secure or error free and may contain viruses or may be delayed, and the sender is not liable for any of these occurrences.

# Exhibit 2



Zaid Hatoum &lt;zhatoum@refugeerights.org&gt;

---

## P-1 Embassy Referral Submission Inquiry

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**Shak, James P** <ShakJP@state.gov>  
To: Zaid Hatoum <zhatoum@refugeerights.org>  
Cc: "Dohner, Vanessa L (Erbil)" <DohnerVL@state.gov>

Tue, Mar 11, 2025 at 11:46 AM

Hello Zaid,

I'm replying on behalf of Vanessa, who is currently away.

Unfortunately, I did not find active cases for any of the three listed below. I remember Mr. [REDACTED] case. We had multiple interviews with him and determined that he did not qualify for USRAP. Although there is a preliminary injunction, we don't have the capacity to add or process cases right now.

Jim

SENSITIVE BUT UNCLASSIFIED

---

**From:** Zaid Hatoum <zhatoum@refugeerights.org>  
**Sent:** Tuesday, March 11, 2025 2:13:26 AM  
**To:** Dohner, Vanessa L (Erbil) <DohnerVL@state.gov>  
**Subject:** P-1 Embassy Referral Submission Inquiry

Hello Vanessa,

I hope you are doing well. In light of the USRAP EO preliminary injunction issued on February 25, 2025, we would like to inquire about the status of the below embassy referrals. If a case has been approved for admission to USRAP and RSC has created a case number, we would appreciate it if you could provide that number for our records.

### KRI-IRAQ

[REDACTED]  
Note: Our team did not submit this case. [REDACTED] requested that we create a case with IRAP. We did and provided advice and humanitarian cash assistance. However, we lost communication with the client until recently.

### Baghdad- Iraq

[REDACTED]  
Submission Date: 10/25/2024

Note: Officers from the Embassy in Baghdad were in touch with the client. However, we are unsure if the case was approved for admission to USRAP. If so, can RSC provide us with the case number?

### KRI-IRAQ

[REDACTED]  
P-1 Embassy Referral Submission Date: 01/16/2025



Note: The receipt was confirmed. However, we were told this case would not proceed due to the suspension. Any luck now, given the preliminary injunction?

Thank you so much,  
Zaid

--

**Zaid Hatoum** (*He/him/his*)

Global Screenings & Casework Director

International Refugee Assistance Project

One Battery Park Plaza, 33rd Floor

New York, NY 10004

Phone: +1(516) 732 2992

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Admitted to practice law in the state of New York.



# Exhibit 3



Zaid Hatoum &lt;zhatoum@refugeerights.org&gt;

---

**Follow up on the Tunisian case**

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**Dossett, Tabari (Tunis)** <DossettT@state.gov>  
To: Zaid Hatoum <zhatoum@refugeerights.org>

Tue, Mar 11, 2025 at 3:48 AM

Hi Zaid,

All cases have been put on hold. I will let you know if there are any updates however I would recommend looking into other options for this case.

Best,

Tabari

---

**From:** Zaid Hatoum <zhatoum@refugeerights.org>  
**Sent:** Tuesday, March 11, 2025 12:17 AM  
**To:** Dossett, Tabari (Tunis) <DossettT@state.gov>  
**Subject:** Re: Follow up on the Tunisian case

Hello Tabari,

In light of the USRAP EO preliminary injunction issued on February 25, 2025, we would like to inquire about the status of the below embassy referral. Was this case approved for admission to USRAP? If so, can you provide us with the USRAP case number for our records?

Thank you very much.  
Zaid

On Mon, Jan 6, 2025 at 8:03AM Dossett, Tabari (Tunis) <DossettT@state.gov> wrote:  
Thank you!

---

**From:** Zaid Hatoum <zhatoum@refugeerights.org>  
**Sent:** Monday, January 6, 2025 1:54:02 PM  
**To:** Dossett, Tabari (Tunis) <DossettT@state.gov>  
**Subject:** Re: Follow up on the Tunisian case

Happy New Year to you too!

Certainly, this is from her caseworker:

Phone:

- Used on WhatsApp and in Tunisia SMS/Call)
- I can confirm this number is up to date via WhatsApp.

Email:

**Zaid Hatoum** (He/him/his)  
Global Screenings & Casework Director  
International Refugee Assistance Project  
One Battery Park Plaza, 33rd Floor  
New York, NY 10004  
Phone: +1(516) 732-2992

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On Mon, Jan 6, 2025 at 6:30AM Dossett, Tabari (Tunis) <DossettT@state.gov> wrote:  
Hi Zaid.

Happy new year!

In order to continue case processing, we'll need [REDACTED] contact information. A phone number and email would be best.

Would it be possible to share her information?

Best,

Tabari

**From:** Zaid Hatoum <[zhatoum@refugeerights.org](mailto:zhatoum@refugeerights.org)>  
**Sent:** Thursday, December 26, 2024 11:07:52 PM

**To:** Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)>  
**Subject:** Re: Follow up on the Tunisian case

Thank you for the update. Happy holidays for you too!

**Zaid Hatoum** (*He/him/his*)  
Global Screenings & Casework Director  
International Refugee Assistance Project  
One Battery Park Plaza, 33rd Floor  
New York, NY 10004  
Phone: +1(516) 732-2992

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On Thu, Dec 26, 2024 at 9:31 AM Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)> wrote:

Hi Zaid,

Just to provide the update that all went well with fingerprints today.

I have submitted them to DC for processing and we will be in touch with her for next steps once the processing is complete.

Happy Holidays!

Tabari

**From:** Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)>  
**Sent:** Thursday, December 19, 2024 7:10 PM

**To:** Zaid Hatoum <[zhatoum@refugeerights.org](mailto:zhatoum@refugeerights.org)>  
**Subject:** Re: Follow up on the Tunisian case

Ok thank you for sharing. She will need to bring the passport for access.

**From:** Zaid Hatoum <[zhatoum@refugeerights.org](mailto:zhatoum@refugeerights.org)>  
**Sent:** Thursday, December 19, 2024 6:54:19 PM  
**To:** Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)>  
**Subject:** Re: Follow up on the Tunisian case

Yes, and she only has a passport. Attached.

On Thu, Dec 19, 2024 at 12:47 PM Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)> wrote:

Hi Just to bring an ID. I will make sure she is on the list for entry. To confirm - her id only has her birth name correct?

**From:** Zaid Hatoum <[zhatoum@refugeerights.org](mailto:zhatoum@refugeerights.org)>  
**Sent:** Thursday, December 19, 2024 6:31:49 PM  
**To:** Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)>  
**Subject:** Re: Follow up on the Tunisian case

Hi Tabari,

Yes, confirmed. The client can come to the US Embassy in Tunis on Thursday, 12/26, at 2 pm local time. She asked what to bring with her and if there were any instructions on what to tell them at the gate. Any advice would be appreciated.

Thank you,  
Zaid

On Thu, Dec 19, 2024 at 12:08 PM Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)> wrote:

Hi Zaid,

2pm if possible.

Tabari

**From:** Zaid Hatoum <[zhatoum@refugeerights.org](mailto:zhatoum@refugeerights.org)>  
**Sent:** Thursday, December 19, 2024 6:05:47 PM  
**To:** Dossett, Tabari (Tunis) <[DossettT@state.gov](mailto:DossettT@state.gov)>  
**Subject:** Re: Follow up on the Tunisian case

Hi Tabari,

We will confirm that with the client and get back to you as soon as possible. Is there a specific time on Thursday?

Thank you so much,  
Zaid

On Thu, Dec 19, 2024 at 11:50AM Dossett, Tabari (Tunis) <DossettT@state.gov> wrote:  
Hi Zaid -

Good news, the case has been accepted and we are ready to move to next steps.

We would like to prepare the case for a virtual interview however in order to do so we will need for her to come to the embassy to have fingerprints taken. These will be done on paper and sent to DC to complete the security clearance for the case.

Can you please confirm if she is comfortable coming to the embassy on Thursday of next week to have the fingerprints taken?

I will be there to escort her.

Best,

Tabari

---

**From:** Dossett, Tabari (Tunis) <DossettT@state.gov>  
**Sent:** Wednesday, December 18, 2024 12:14:08 PM  
**To:** Zaid Hatoum <zhatoum@refugeerights.org>  
**Subject:** Re: Follow up on the Tunisian case

Hi Zaid,

Thank you for sharing this update.

This is a very concerning development.

I am in touch with DC about this case and working to try to have the processing expedited.

Tabari

---

**From:** Zaid Hatoum <zhatoum@refugeerights.org>  
**Sent:** Monday, December 16, 2024 7:27 PM  
**To:** Dossett, Tabari (Tunis) <DossettT@state.gov>  
**Subject:** Follow up on the Tunisian case

Hello Tabari,

We would like to update you regarding [REDACTED] a client we referred to your office in May 2024. She continues to live at risk of violence from her family and neighbors as a transwoman in Tunis.

In October 2024, we were informed by [REDACTED] that [REDACTED] been arrested after she attempted to cross the ocean to Europe via smugglers. They did not have the exact details and IRAP attempted to contact [REDACTED] for some time. On 22 November 2024, [REDACTED] responded and confirmed that she now has access to her phone and that her number and emails have not changed. She does not anticipate issues communicating with her.

I am providing a summary of events below:

On 02 November, [REDACTED] woke up at 3 am and traveled to a coastal area outside of Tunis known as Kelibia. This is a popular destination for people to take boats and attempt to cross to Europe. She had heard of a smuggler through word of mouth and contacted him via phone a few days prior. She did not explain the full extent of her story and did not mention being a trans woman. She merely told the smuggler that she needed to get out of Tunisia.

She waited until 11 pm without food to board the boat. They entered rough waters and were almost immediately stopped by Tunisian coast guard. The whole boat was evacuated and then arrested. She entered a holding cell, then she went to court (there was no legal decision issued but just an investigation opened about her and the others trying to cross the ocean on the boat).

She was in prison for about 17 days and was with men in the cell. She had no access to hormone treatment or even proper nutrition whilst she was in jail. Prior to her arrest, she had carried hormone pills in her pocket. She embarked on the boat and the medicine got ruined in the sea due to water. The pills broke into a powder. The police had accused her of carrying cocaine (the way the medicine looked was white powder) in her pockets.

As a result of this accusation, she was then tortured: she was starved for 3 days, left naked, and beaten with clubs and hands in a single cell. After being tortured for 3 days, she was forced to confess to harboring drugs. She was then returned to a normal cell. She was then released after 17 days. During her stay in prison, she did not have any legal counsel. She has to pay 500 dinar in fees but has not yet paid. If she does not pay she can be arrested at any time.

Whilst in prison, she was given one phone call. She called her sister when she; the sister knew of someone who worked at the prison (like a warden or police) and he helped [REDACTED] by getting rid of the cocaine charges. As a result, there are no drug charges against her. She only has that fee for attempting to migrate illegally. When she returned home the father did not ask her where she was but would say things like "why did you return." He has not hit her but she is psychologically and medically ill. She has a persistent cough and wants to seek medical attention. She is traumatized from the actual boat ride and subsequent treatment in jail.

Please let us know if you have any updates on this case.

Thank you,  
Zaid

--

**Zaid Hatoum** (*He/him/his*)  
Global Screenings & Casework Director  
International Refugee Assistance Project  
One Battery Park Plaza, 33rd Floor  
New York, NY 10004  
Phone: +1(516) 732-2992

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--

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--  
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# Exhibit 4





Kathleen Norland List <knorland@refugeerights.org>

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## [NORMAL] IRAP P1 NGO Referral Submission - LE (ERAC): S-39237

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'Fair, Melissa' via IRAP Lebanon P1 NGO Referrals <IRAP-LE-

Tue, Mar 11, 2025 at

P1NGOReferrals@refugeerights.org>

9:02 PM

Reply-To: "Fair, Melissa" <FairM@state.gov>

To: IRAP LE P1 NGO Referrals <irap-le-p1ngoreferrals@refugeerights.org>, LE\_IN\_RSCTuME <le\_in\_rsctume@icmc.net>

Cc: Alexandra Zetes <azetes@refugeerights.org>, Firas Abi Ghanem <fabighanem@refugeerights.org>, Yara Nassar

<ynassar@refugeerights.org>, "McGlothlin, Cameron D" <McGlothlinCD@state.gov>, "Ergin, Irmak (Istanbul)"

<ErginI@state.gov>, "Dunstan, Edmund Fleetwood (Woody)" <DunstanEF@state.gov>, "Knapp, Patrick J (Istanbul)"

<KnappPJ@state.gov>, "Rivera-Olds, Josue (Istanbul)" <Rivera-OldsJ@state.gov>, PRM-Admissions-Coordination <PRM-

Admissions-Coordination@state.gov>, PRM-Admissions-Leadership <PRM-Admissions-Leadership@state.gov>

Dear Kate,

The State Department will continue to comply with relevant court orders and coordinate with the Department of Homeland Security to implement President Trump's America First policy priorities. We do not have any additional information to share about specific USRAP case processing at this time. Updates and additional guidance on the status of USRAP processing will be posted on State.gov website when available. Many thanks.

Warm Regards,

Melissa Fair

Foreign Affairs Officer

Coordination and Resources Team | Office of Refugee Admissions (PRM/A)

Bureau of Population, Refugees, and Migration (PRM)

[Quoted text hidden]

# Exhibit 5



Kathleen Norland List <knorland@refugeerights.org>

---

## Post-USCIS Urgent P1 Submissions - IRAP

---

**Fair, Melissa** <FairM@state.gov>

Tue, Mar 11, 2025 at 8:59 PM

To: IRAP Jordan P1 NGO Referrals <irap-jo-p1ngoreferrals@refugeerights.org>

Cc: Kurt Bonz <kbonz@refugeerights.org>, Kathleen Norland List <knorland@refugeerights.org>, Waqas Atique <watique@refugeerights.org>, "Rincon, Natalia" <RinconN@state.gov>, "Gringer, Jeffrey D (Amman)" <gringerjd@state.gov>, "Porras-Munoz, Beatriz E (Amman)" <Porras-MunozBE@state.gov>, PRM-Admissions-Coordination <PRM-Admissions-Coordination@state.gov>, PRM-Admissions-Leadership <PRM-Admissions-Leadership@state.gov>

Dear Elisa,

The State Department will continue to comply with relevant court orders and coordinate with the Department of Homeland Security to implement President Trump's America First policy priorities. We do not have any additional information to share about specific USRAP case processing at this time. Updates and additional guidance on the status of USRAP processing will be posted on State.gov website when available. Many thanks.

Warm Regards,

Melissa Fair

Foreign Affairs Officer

Coordination and Resources Team | Office of Refugee Admissions (PRM/A)

Bureau of Population, Refugees, and Migration (PRM)

---

**From:** IRAP Jordan P1 NGO Referrals <irap-jo-p1ngoreferrals@refugeerights.org>

**Sent:** Thursday, March 6, 2025 2:59 AM

**To:** Fair, Melissa <FairM@state.gov>; Gringer, Jeffrey D (Amman) <gringerjd@state.gov>; Porras-Munoz, Beatriz E (Amman) <Porras-MunozBE@state.gov>

**Cc:** Kurt Bonz <kbonz@refugeerights.org>; Kathleen Norland List <knorland@refugeerights.org>; Waqas Atique <watique@refugeerights.org>

**Subject:** Re: Post-USCIS Urgent P1 Submissions - IRAP

Dear Melissa, Jeff, and Beatriz,

[Quoted text hidden]

[Quoted text hidden]

# Exhibit 6

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;  
PLAINTIFF JOSEPHINE; PLAINTIFF  
SARA; PLAINTIFF ALYAS; PLAINTIFF  
MARCOS; PLAINTIFF AHMED;  
PLAINTIFF RACHEL; PLAINTIFF ALI;  
HIAS, INC.; CHURCH WORLD SERVICE,  
INC.; and LUTHERAN COMMUNITY  
SERVICES NORTHWEST,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States; MARCO  
RUBIO, in his official capacity as Secretary of  
State; KRISTI NOEM, in her official capacity  
as Secretary of Homeland Security; ROBERT  
F. KENNEDY, JR., in his official capacity as  
Secretary of Health and Human Services,

*Defendants.*

CASE NO. C25-255 JNW

**DECLARATION OF KATHERINE  
REHBERG IN SUPPORT OF  
PLAINTIFFS' MOTION TO  
SUPPLEMENT PRELIMINARY  
INJUNCTION**

I, Katherine Rehberg, hereby declare:

1. I am Vice President of Programs at Church World Service (CWS), one of ten national resettlement agencies. The facts set forth in this declaration are based on my personal knowledge, on my conversations with CWS staff, and on the information kept in the ordinary

1 course of business at CWS.

2 2. I make this declaration for the purpose of supporting facts set forth by Plaintiffs in  
3 the Joint Status Report to the Court and to add to information provided in declarations executed  
4 by our Chief Executive Officer, Richard Santos, on February 11, 2025 (Dkt No. 15-23) and March  
5 5, 2025 (Dkt No. 58-3).

6 3. CWS has received **no funds** from the Department of State's Bureau of Population,  
7 Migration, and Resettlement (PRM) since January 14, 2025, including for reimbursements for  
8 USRAP work performed prior to the Funding Suspension and Stop-Work Orders of January 24,  
9 2025.

10 4. This work was done pursuant to five cooperative agreements. Four of these  
11 cooperative agreements were for work done to assist refugees and holders of Special Immigrant  
12 Visas (SIVs), and the fifth is to operate the Resettlement Support Center-Africa, based in Nairobi,  
13 Kenya.

14 5. On February 6, 2025, after PRM required CWS to file for reimbursements using  
15 new certification forms, CWS made thirteen drawdown requests for reimbursements for work  
16 done pursuant to these five cooperative agreements. PRM acknowledged receipt of those requests  
17 on February 7, stating in an email that our submission had correctly followed the new certification  
18 process. We also submitted four additional reimbursement requests on February 24, 2025, and  
19 nine additional reimbursement requests on March 3, 2025 following the same process.

20 6. Although the Court in this case enjoined the suspension of USRAP on February 25,  
21 2025, and issued a written order on February 28, 2025, making clear that the Funding Suspension  
22 was also enjoined, CWS has still not received any payment through the certification process we  
23 have complied with since February 6 or through any other mechanism. This is so despite  
24 numerous communications via email and telephone with our staff. To date, in response to our  
25 requests for updates on when we can expect to receive payment, PRM has told us that the  
26 payments are still under review.

1           7. As described in Richard Santos's declaration of March 5, 2025, CWS received  
2 Notices of Termination of four of our five USRAP cooperative agreements on February 26, 2025.  
3 We did not receive a Notice of Termination of our cooperative agreement to operate RSC-Africa.  
4 In fact, on March 7, we received a notification from PRM that the Notice of Suspension on RSC-  
5 Africa was being lifted. CWS responded the same day with a "concurrence" requested by the  
6 government, but we have not yet received any funds to operate RSC-Africa, nor additional  
7 guidance on what specific processing activity RSC-Africa is expected to resume.

8           8. RSC-Africa also still does not have access to the START database, the case  
9 management system maintained by PRM's Refugee Processing Center, where case processing  
10 functions are documented and where information regarding a refugee's readiness and needs for  
11 travel are stored. PRM cut off access following the suspension, and although the suspension has  
12 been lifted for RSC-Africa, access has not been reinstated. Without the database, RSC-Africa  
13 cannot continue processing cases in the USRAP pipeline.

14           9. At 6:07 pm Eastern Standard Time on March 13, CWS received an email from the  
15 Department of State, attached here as Attachment A. The email stated that USRAP operations  
16 using the services of CWS and the International Office of Migration (IOM) "may resume,  
17 including operations for Resettlement Support Centers and to provide global resettlement  
18 logistical support, including issuance of documents and facilitation of medical examinations and  
19 refugee travel." This communication acknowledged that "in the weeks since refugee resettlement  
20 was suspended and stop-work orders were issued, there has been significant deterioration of  
21 functions throughout the USRAP," but provided no further timeline or guidance.

22           10. The email further stated that the Department of State is "actively preparing a request  
23 for proposals for a new resettlement agency that could provide reception and placement services  
24 for resettled refugees and exploring alternatives to the traditional reception and placement  
25 program for the provision of domestic support."

26           11. Finally, the email stated that the Department of State is "reviewing pending  
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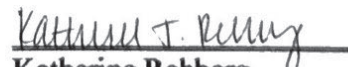
1 payment requests from organizations for expenses already incurred and will pay legitimate  
2 requests in due course.” No further timeline was provided.

3 12. It is difficult to predict how and when our work with overseas clients will resume.  
4 We have no visibility into the travel-readiness of the approved refugees who were booked and/or  
5 ready for travel on January 20. There are likely many vetted and assured cases that would now  
6 need to complete an updated medical examination or other processing activity before they can  
7 travel, because the necessary documentation has expired in the weeks since the USRAP was  
8 suspended. In short, not only are approved refugees stuck overseas waiting for departure, but it  
9 will now take additional effort by USRAP partners for them to become travel-ready.

10 13. Today, on March 14, 453 employees in the United States will be laid off, and in the  
11 past week, approximately 25 employees were furloughed. These are a subset of the 858 employees  
12 who were furloughed last month. These layoffs are in addition to the 600 layoffs we initiated in  
13 RSC-Africa after receiving Notices of Suspension on January 24, 2025, leaving approximately  
14 119 staff members working on the RSC-Africa program. Prior to the Funding Suspension, RSC-  
15 Africa was a robust operation of nearly 900 staff in four countries.

16 14. Without funding and a resumption of resettlement processing, refugees already  
17 approved for resettlement remain without safety, and CWS remains unable to rehire staff who  
18 have been furloughed or laid off because of the suspensions and terminations. Without immediate  
19 relief, the immeasurable and irreparable harm caused to refugees and the organizations and  
20 partners prepared to serve them continues.

21 EXECUTED this 14th day of March, 2025, at New York, NY.

22   
23 Katherine Rehberg

# Attachment A

**From:** [Anderson, Kathryn E](#)  
**To:** [Erol Kekic](#); [Katherine Rehberg](#); [Scott Muttersbaugh](#); [Nicole Brudos](#); [Thomas Joseph Mrosko](#); [Catherine MacKay](#)  
**Cc:** [Gauger, Kelly A](#); [Putzeys, Claire](#); [Shinbach, Annie](#)  
**Subject:** U.S. Refugee Admissions Program Update  
**Date:** Thursday, March 13, 2025 6:08:24 PM  
**Attachments:** [NOTICE OF COURT ORDER.pdf](#)

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CWS Partners,

Pursuant to the district court's February 28th preliminary injunction in *Pacito v. Trump*, 2:25-cv-255-JNW (please see attached Notice of Court Order), the Departments of State and Homeland Security are taking steps to resume U.S. Refugee Admissions Program (USRAP) refugee processing, decisions, and admissions and to reimburse resettlement partners for USRAP-related work performed before January 20, 2025, pursuant to cooperative agreements.

These steps include, but are not limited to:

- The Department of State has notified the International Organization for Migration (IOM) and Church World Service (CWS) that, following their confirmation of compliance with Executive Orders 14151, 14148, and 14168, USRAP operations using their services may resume, including operations for Resettlement Support Centers and to provide global resettlement logistical support, including issuance of documents and facilitation of medical examinations and refugee travel.
- U.S. Citizenship and Immigration Services staff have resumed rendering decisions on Form I-590 refugee applications, Requests for Review (RFRs), Form I-730 Follow-to-Join refugee petitions (FTJ-Rs), and Form I-290B Notices of Appeal or Motion relating to Form I-730 FTJ-Rs.
- The Department of State directed all diplomatic and consular posts to resume processing for beneficiaries of approved Form I-730 Follow-to-Join refugee petitions, including rescheduling interviews with beneficiaries whose appointments were canceled. Individuals with approved I-730 Follow-to-Join refugee applications may receive a document permitting their independent travel to the United States.
- The Department of State is actively preparing a request for proposals for a new resettlement agency that could provide reception and placement services for resettled refugees and exploring alternatives to the traditional reception and placement program for the provision of domestic support.
- The Department of State is reviewing pending payment requests from organizations for expenses already incurred and will pay legitimate requests in due course.

However, in the weeks since refugee resettlement was suspended and stop-work orders were issued, there has been significant deterioration of functions throughout the USRAP. The Department of State is working to ascertain how long it will take to restore the USRAP to operational status. We will share updates and additional guidance on the status of USRAP processing when available.

All media inquiries should be directed to the nearest U.S. Embassy, or the Bureau of Population, Refugees, and Migration at the Department of State in Washington, DC, at [PRM-Press@state.gov](mailto:PRM-Press@state.gov).

Kathryn Anderson  
Director, Office of Admissions  
Bureau of Population, Refugees, and Migration (PRM)  
U.S. Department of State